

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF PENNSYLVANIA

FRANKLIN INTERIORS, INC.,)	No. 2:20-cv-1423- AJS
)	
Plaintiff,)	Judge Arthur J. Schwab
)	
V.)	
)	
PETER M. WESOLOSKY and DIRT)	
ENVIRONMENTAL SOLUTIONS, INC.,)	
)	
Defendants.)	

MOTION FOR REDACTION OF TRANSCRIPT

NOW COMES Plaintiff, Franklin Interiors, Inc. ("Franklin"), by and through its attorneys, Steven P. Engel, Esquire, Gary H. Dadamo, Esquire, and the law firm of Maiello, Brungo & Maiello, LLP, and hereby files this Motion for Redaction of Transcript, and in support thereof avers as follows:

1. On October 14, 2020, Plaintiff and Defendants entered into a Confidentiality Agreement. A true and correct copy of the Confidentiality Agreement is attached hereto and marked as Exhibit 1.
2. The Confidentiality Agreement protects certain confidential and proprietary information of the parties, including trade secrets, business strategies, marketing plans, etc.
3. On September 30, 2020, the Court held argument on Plaintiff's Motion for Preliminary Injunction.
4. A transcript of the September 30, 2020 was prepared by the court reporter.
5. Plaintiff requests that the transcript be redacted to protect certain confidential/proprietary information of Plaintiff as follows: Page 10, Line 25; Page 11, Lines 1-4; Page 14, Lines 4-11, 13-23; Page 17, Lines 3-12, 17-22; Page 20, Lines 20-25; Page 21, Lines 1-3; Page 33, Lines 20 - 23; Page 37, Lines 12-15; Page 51, Lines 14-15; Page 70, Lines 14-18;

Page 71, Lines 8-10; Page 74, Lines 12-14,18-21; Page 76, Lines 11-12, 16-20; and Page 77, Lines 22-24.

6. The information sought to be redacted does not appear otherwise in documents filed in the case that are available to the public.

7. Counsel for Defendants advised that Defendants do not oppose the relief sought by this Motion.

WHEREFORE, for the reasons set forth herein, Plaintiff, Franklin Interiors, Inc., respectfully requests that this Honorable Court grant its Motion and enter the Order attached hereto.

RESPECTFULLY SUBMITTED,

MAIELLO, BRUNGO & MAIELLO, LLP

BY: s/Gary H. Dadamo
Gary H. Dadamo, Esquire
Pa. I.D. #93292
ghd@mbm-law.net

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Lindsey Conrad Kennedy, Esq.
Michael P. Pest, Esq.
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and I hereby certify that I have mailed by U.S. Postal Service the document to the following:

Marsia L. Balobeck
Official Court Reporter
700 Grant Street
Suite 5300
Pittsburgh, Pennsylvania 15219

MAIELLO, BRUNGO & MAIELLO, LLP

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Attorney for Plaintiff

Dated: December 11, 2020